

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C.

In the Matter of	)	
	)	
Petition Pursuant to 47 U.S.C. § 160	)	WT Docket No. 01-184
For Partial Forbearance From the	)	
Commercial Mobile Radio Services	)	
Number Portability Obligation	)	

**REPLY COMMENTS OF NEXTEL COMMUNICATIONS, INC.**

Nextel Communications, Inc. (“Nextel”) hereby respectfully submits these Reply Comments in the above-captioned proceeding. Nextel opposes the Verizon Wireless (“Verizon”) Petition for Partial Forbearance from the Federal Communications Commission’s (“Commission”) wireless local number portability (“LNP”) rules. As it has throughout this five-year plus proceeding, Nextel continues to believe that LNP will benefit consumers and enhance competition. Participation in thousands-block number pooling, however, is currently required on the same date as LNP implementation next year. Therefore, Nextel submits that the wiser course would be to delay LNP implementation for sixty days, until February 1, 2003, to allow a brief transition period to implement these Commission initiatives.

**I. NEXTEL SUPPORTS LNP AND OPPOSES FORBEARANCE**

Since the Commission’s first tentative conclusion that telephone number portability was in the public interest in 1995, Nextel has supported LNP<sup>1</sup> and

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<sup>1</sup> See Comments of Nextel, dated September 12, 1995, and Reply Comments of Nextel, dated October 12, 1995, in CC Docket No. 95-116.

opposed delaying its implementation.<sup>2</sup> By eliminating an existing barrier in both the wireline and wireless telecommunications marketplace, number portability should further increase competition among all telecommunications providers, thereby benefiting consumers through more choices, lower prices and enhanced services. LNP will remove a significant barrier to consumers interested in changing providers, but are hesitant to change due to the need to keep their existing telephone number.

Therefore, Nextel agrees with those commenters who oppose forbearance due to its potential impact on competition, both within the wireless marketplace and vis-à-vis wireless-wireline competition.

## **II. THE COMMISSION SHOULD PROVIDE FOR A BRIEF TRANSITION PERIOD BETWEEN NUMBER POOLING AND LNP**

Like other wireless carriers, Nextel has already spent significant time and resources in evaluating and beginning to modify its systems, such as provisioning and activations, customer care, billing, IT and network operations for LNP. At the same time as Nextel implements LNP, Nextel is implementing related software and network modifications in order that it can participate in thousands-block number pooling by November 24, 2002. Further still, Nextel is implementing other Commission regulatory mandates, such as CALEA, E911 and TTY next year. Given scarce resources, Nextel believes that the Commission should briefly delay implementation of LNP.

As described by Sprint PCS, Voicestream, and AT&T Wireless, LNP implementation involves far greater work than that required for number pooling.

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<sup>2</sup> See Comments of Nextel, dated February 23, 1998, and Reply Comments

In particular, LNP requires significant internal testing and intercarrier coordination with other carriers. In addition, some of the most critical functions for successful LNP implementation – customer care, activations and billing will need to be modified and/or impacted.

These multi-system modifications will be more difficult than they might otherwise be because they all will occur at the same time and during the holiday season when significant activations of new customers occurs. Therefore, Nextel agrees with those other carriers who argue that a transition period to LNP from the implementation of number pooling is warranted. Only a brief delay is necessary. Nextel recommends that sixty days will provide the wireless community satisfactory time to transition its efforts from number pooling by November 24, 2002 to LNP by February 1, 2003. This brief delay would allow continued testing and coordination after the wireless industry's busy holiday season.

Because the LNP deadline is just about one year away, Nextel concurs with Sprint that a quick decision in this matter will enable carriers to plan and deploy their scarce resources. Nextel opposes, however, the long implementation delays advanced by Sprint.

### **III. CONCLUSION**

Nextel opposes any forbearance from LNP implementation. LNP will provide increased competition throughout the telecommunications industry and will provide a direct benefit to consumers. Due to the Commission's requirement that number pooling be completed at the same time, however, Nextel believes

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of Nextel, dated March 10, 1998, in CC Docket No. 95-116.

that a brief delay or transition period is warranted so that all LNP systems and processes can be fully tested and implemented after pooling and after the holiday season.

Respectfully submitted,  
NEXTEL COMMUNICATIONS, INC.

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